

REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed July 15, 2004. Reconsideration and allowance of the application and pending claims are respectfully requested.

I. Claim Rejections - 35 U.S.C. § 112, Second Paragraph

Claim 17 has been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. In response to the rejection, Applicant has amended claim 17 to provide proper antecedent basis for the claimed "scanner portion".

In view of the above-described amendment, it is respectfully asserted that claim 17 defines the invention in the manner required by 35 U.S.C. § 112. Accordingly, Applicant respectfully requests that the rejections to these claims be withdrawn.

II. Claim Rejections - 35 U.S.C. § 103(a)

A. Rejection of Claims 1-3, 6, 9-11, 14, and 17-20

Claims 1-3, 6, 9-11, 14, and 17-20 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Crawford (GB Pat. No. 2331820). Applicant respectfully traverses this rejection.

As is noted above, each of Applicant's independent claims has been amended. In view of those amendments, the rejection is believed to be moot as having been drawn against the claims in a previous form. Applicant discusses the applicability of Crawford in the following, however, for the Examiner's consideration.

1. The Crawford Reference

Crawford discloses a “document platform”, such as a photocopying machine, that is configured to verify the identity of a user. Crawford, page 1, lines 32-33. As is described by Crawford, the document platform includes an independent fingerprint sensor that is set to recognize particular fingers of each authorized user of the document platform. Crawford, page 1, lines 33-35.

In both disclosed embodiments, the fingerprint sensor (e.g., sensor 40, Fig. 1) is provided in a user interface that comprises “a keyboard or keypad through which operation of the document platform 10 can be programmed.” Crawford, page 2, lines-2-5. The fingerprint sensor includes its own dedicated processing circuitry that is either independent of the main machine architecture (circuitry 50, Fig. 1) or that is integrated into the main machine architecture (circuitry 80, Fig. 2).

2. Applicant’s Claimed Inventions

Applicant claims methods, systems, and media that pertain to authenticating a user of a peripheral. Applicant discusses the claims in the following.

(a) Claims 1-3 and 6

Independent claim 1 provides (emphasis added):

1. A method, comprising:
receiving a user’s finger within *a finger slot provided in a lid that covers an image window of a scanner* of a multifunction peripheral;
obtaining a biometric image of the user’s finger by scanning the user’s finger with the scanner;

comparing the biometric image to a biometric key; and
authenticating a user of the multifunction peripheral based on a
match between the biometric image and the biometric key.

As is apparent from the above, claim 1 describes a method in which the user's finger is scanned by a scanner of a multifunctional peripheral when the finger is provided in a slot that is provided within a lid that covers an image window of the scanner. Such a method is not and cannot be practiced with the Crawford system. Specifically, as is described above, Crawford discloses a device ("document platform") that includes an independent fingerprint sensor that is provided in a user interface that comprises "a keyboard or keypad through which operation of the document platform 10 can be programmed." In other words, the Crawford device scans the user's finger with a sensor that is *separate* from the scanner of the device.

Applicant notes that the above-identified distinction is significant. Specifically, the method described by Crawford requires that a separate sensor and its associated "circuitry" be integrated into the device user interface. Such a requirement can be disadvantageous for several reasons. First, the provision of such a sensor and its additional circuitry adds to the cost of the device. Second, the sensor requires user interface space that is typically scarce on such devices. In contrast to Crawford's teachings, however, Applicant utilizes an already-existing resource of a peripheral device to collect biometric data of a user, i.e. the device scanner. By doing so, no extra sensor or circuitry is necessary, therefore potentially lowering the cost of the device and freeing precious user interface space.

Given that Crawford only discloses embodiments that include a separate fingerprint sensor and associated circuitry, a person having ordinary skill in the art would not be motivated from the Crawford disclosure to practice "obtaining a biometric

image of the user's finger by scanning the user's finger with the scanner" as is required by claim 1. Furthermore, given that Crawford says nothing about scanning the user's finger with the device scanner (as opposed to a separate sensor), such a person would certainly not be motivated to receive a user's finger within a finger slot "provided in a lid that covers an image window of a scanner of a multifunction peripheral".

In view of the above, Crawford does not render claim 1, or claims 2-3 and 6 which depend therefrom, obvious. Applicant therefore respectfully requests that the rejection be withdrawn.

(b) Claims 9-11 and 14

Independent claim 9 provides (emphasis added):

9. (Currently amended) A system, comprising:

a multifunction peripheral;

a finger slot that provides access to an image window in a scanner portion of the multifunction peripheral;

a data collection module configured to obtain a biometric image ***by scanning a user's finger contained within the finger slot using the scanner portion;***

a data evaluation module configured to compare the biometric image to a biometric key; and

an authenticator module configured to provide access to the multifunction peripheral based a match between the biometric image and the biometric key.

In view of the discussion provided in relation to claim 1, it is clear that Crawford neither teaches or suggests "a finger slot that provides access to an image window in a

scanner portion of the multifunction peripheral” or “a data collection module configured to obtain a biometric image by scanning a user’s finger contained within the finger slot using the scanner portion” as are required by claim 9. Applicant therefore respectfully submits that Crawford does not render claim 9, or claims 10-11 and 14 that depend therefrom, obvious, and respectfully requests that the rejection be withdrawn.

(c) Claims 17-20

Independent claim 17 provides (emphasis added):

17. (Currently amended) A processor-readable medium having processor-readable instructions thereon which, when executed by one or more processors cause the one or more processors to:

obtain a biometric image *by scanning with a scanner portion of a multifunction peripheral a finger of a user* contained within a *finger slot defined within a lid that covers the scanner portion*;

compare the biometric image to a biometric key; and

authenticate the user of the multifunction peripheral based on a match between the biometric image and the biometric key.

For reasons discussed above in relation to claims 1 and 9, Crawford does not teach or suggest instructions that cause a processor to “obtain a biometric image by scanning with a scanner portion of a multifunction peripheral a finger of a user contained within a finger slot defined within a lid that covers the scanner portion” as is required by claim 17. Applicant therefore respectfully submits that Crawford does not render claim 17, or claims 18-20 that depend therefrom, obvious, and respectfully requests that the rejection be withdrawn.

B. Rejection of Claims 8 and 16

Claims 8 and 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Crawford in view of Edmonds, III, et al. (“Edmonds,” U.S. Pat. No. 6,229,908). Applicant respectfully traverses this rejection.

As identified above in reference to independent claims 1 and 9, Crawford does not teach several of Applicant’s explicit claim limitations. In that Edmonds does not remedy this deficiency of the Crawford reference, Applicant respectfully submits that claims 8 and 16, which depend from claims 1 and 9, respectively, are allowable over the Crawford/Edmonds combination for at least the same reasons that claims 1 and 9 are allowable over Crawford.

C. Rejection of Claims 7 and 15

Claims 7 and 15 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Crawford in view of Houdeau (U.S. Pat. No. 6,522,773). Applicant respectfully traverses this rejection.

As identified above in reference to independent claims 1 and 9, Crawford does not teach several of Applicant’s explicit claim limitations. In that Houdeau does not remedy this deficiency of the Crawford reference, Applicant respectfully submits that claims 7 and 15, which depend from claims 1 and 9, respectively, are allowable over the Crawford/Houdeau combination for at least the same reasons that claims 1 and 9 are allowable over Crawford.

D. Rejection of Claims 4, 5, 12, and 13

Claims 4, 5, 12, and 13 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Crawford in view of Stocket (“Securing Data and Financial Transactions”). Applicant respectfully traverses this rejection.

As identified above in reference to independent claims 1 and 9, Crawford does not teach several of Applicant’s explicit claim limitations. In that Stocket does not remedy this deficiency of the Crawford reference, Applicant respectfully submits that claims 4, 5, 12, and 13, which depend from claims 1 and 9, are allowable over the Crawford/Stocket combination for at least the same reasons that claims 1 and 9 are allowable over Crawford.


III. New Claims

As identified above, claims 21-30 have been added into the application through this Response. Applicant respectfully submits that these new claims describe an invention novel and unobvious in view of the prior art of record and, therefore, respectfully requests that these claims be held to be allowable.

CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

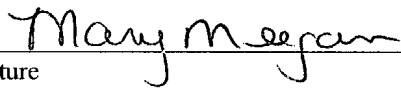
Respectfully submitted,



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8-31-04



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